



S T O L L · K E E N O N · O G D E N  
P L L C

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January 4, 2008

**RECEIVED**

**JAN 04 2008**

**PUBLIC SERVICE  
COMMISSION**

Ms. Elizabeth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

**RE: Case No. 2007-00464**

Dear Ms. O'Donnell:

Enclosed please find an original and ten copies of T-Mobile USA, Inc., Powertel/Memphis, and T-Mobile Central LLC's Motion for Full Intervention in the above reference case. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via our runner.

Very truly yours,

STOLL KEENON OGDEN PLLC

W. Duncan Crosby III

Enclosures

433070.348744/504735.1

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**RECEIVED**  
JAN 04 2008  
PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

<b>PETITION OF THE KENTUCKY COMMISSION</b>	)	
<b>ON THE DEAF AND HARD OF HEARING TO</b>	)	
<b>EXPAND THE FUNDING BASE FOR THE</b>	)	<b>CASE NO.</b>
<b>KENTUCKY TELECOMMUNICATIONS ACCESS</b>	)	<b>2007-00464</b>
<b>PROGRAM (TAP)</b>	)	
	)	

**MOTION FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001, Section 3(8), T-Mobile USA, Inc., Powertel/Memphis, Inc., and T-Mobile Central LLC (collectively, "T-Mobile") submit this motion for full intervention in the above-captioned proceeding.

T-Mobile is a commercial mobile service provider as defined under United States Code, Title 47, Section 332(d). T-Mobile provides wireless voice and data services to customers in the Commonwealth of Kentucky pursuant to licenses issued by the Federal Communications Commission ("FCC").

The Kentucky Commission on the Deaf and Hard of Hearing, in its petition instituting this case, requests the Commission to order wireless telecommunications providers to begin collecting the Telecommunications Relay Service and the Telecommunications Access Program surcharges in the same manner as do wireline telecommunications providers. Accordingly, as a wireless telecommunications provider operating in the Commonwealth of Kentucky, T-Mobile is directly affected by the issues addressed in the Petition in this case, and has a special interest in the proceeding that is not otherwise represented by any party. In addition, participation by T-Mobile is likely to present issues that will assist the Commission without unduly complicating the proceedings.

For the reasons stated above, T-Mobile respectfully requests that its Motion for Full Intervention be granted.

Dated: January 4, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kendrick R. Riggs". The signature is stylized and written over a horizontal line.

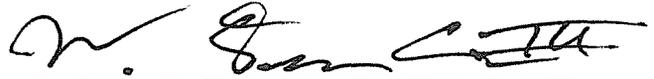
Kendrick R. Riggs  
Douglas F. Brent  
W. Duncan Crosby III  
STOLL KEENON OGDEN PLLC  
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500 West Jefferson Street  
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Telephone: (502) 333-6000

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Motion for Full Intervention has been served by U.S. mail on those persons whose names appear below this 4th day of January, 2008:

Lawrence W. Cook  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

Virginia L. Moore  
Interim Executive Director  
Kentucky Commission on the Deaf and Hard of Hearing  
632 Versailles Road  
Frankfort, Kentucky 40601



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W. Duncan Crosby III